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BY ELECTRONIC MAIL

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.*,
Case No. 15 Civ. 5345 (AJN) (KHP)**

Dear Judge Parker:

We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”). We write to respectfully request that the Court accept for filing under seal the enclosed letter and certain accompanying exhibits. Pursuant to the Court’s September 26, 2017 Individual Practices, ¶ III(e), the accompanying ZIP files include versions of the Kazakh Entities’ letter and exhibits to remain under seal, subject to the Court’s approval, and a version of the filing with highlighting reflecting proposed redactions and slip-sheeted exhibits. In accordance with the Court’s Individual practices, the Kazakh Entities will file the proposed redacted versions on ECF.

The Kazakh Entities’ letter references and attaches documents (as Exhibits 2 through 5) that appear to have been stolen from Republic of Kazakhstan officials and third parties by computer hackers, and are attached as examples of the stolen materials the Khrapunovs are attempting to use in this action. While the Khrapunovs did not designate these documents as confidential when produced, documents stolen in the same hacking campaign have been the subject of a preliminary injunction in other proceedings and found to be “sensitive, proprietary, and confidential, including privileged communications,” *Republic of Kazakhstan v. Does 1-100*, 15-cv-1900 (ER) (S.D.N.Y.), ECF No. 10, and filed under seal by court order. *Republic of Kazakhstan v. Does 1-100*, 15-cv-1900 (ER) (S.D.N.Y.), ECF No. 11.

In accordance with this Court’s prior orders permitting similar documents to be filed under seal in connection with discovery-related motions [*see, e.g.*, ECF Nos. 356, 356-01, 356-02], the Kazakh Entities respectfully requests that the letter and accompanying exhibits be filed under seal.

Respectfully,

/s/ Matthew L. Schwartz
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